

September 5, 2021

direct dial 202 508 5842  
direct fax 404 541 3362

Office of the Attorney General  
Attn: Consumer Protection and Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301

*Via email*

***Re: Notification Regarding Ransomware and Follow-Up***

To Whom It May Concern:

This letter serves to notify the New Hampshire Office of the Attorney General of a data security incident that appears to involve personal information pertaining to New Hampshire residents.

*How the incident occurred and was discovered:*

In June of this year, The Victory Bank of Limerick, PA (“Victory”), located at 548 N Lewis Rd, Limerick, PA 19468, suffered a ransomware attack on certain of its systems. Most of our systems containing our customer information is outsourced to a leading third party financial services outsourcer, whose systems were not impacted. Victory and our firm promptly retained Stroz Friedberg and the FBI. In order to protect any personal information against publication, we also retained leading threat actor negotiator Coveware.

Victory was able to restore its systems and data from backups, which enabled it to focus its threat actor negotiations on protection of personal information. In negotiation with the threat actor, it did appear that certain files containing some personal information might have been accessed by the threat actor, so Victory engaged in lengthy negotiations with the threat actor to obtain the strongest assurances possible that any such information would not be published and would be destroyed, and then obtained such assurances upon paying the negotiated ransom amount.

On August 28, we were able to determine that the information of 5 New Hampshire residents may have been accessed by the threat actor, consisting of social security numbers and in some cases drivers’ license numbers; all indications to date are that such information was destroyed and not misused as agreed; Coveware has provided valuable information throughout the process on the *modus operandi* of the threat actor.

Through this negotiation and enhancements to its security programs since the incident, Victory has done its utmost to protect the personal information affected during this incident and the personal information of its customers and employees generally going forward. Moreover, we do not know of or expect any misuse of their data, and have good reason to believe that any personal information involved in this incident has not and will not be publicly breached. In an abundance of caution and out of concern for the privacy of our customers and employees, however, we are offering each one who resides in New Hampshire two years of credit monitoring as per the attached letter.

*Sample notice and credit monitoring details*

A sample of the notification provided to affected individual is enclosed, together with details about the free credit monitoring service offered to recipients of the notification, which affected individuals will be receiving this week.

Please let us know if you need more information.

Sincerely,

*Anthony D. Glosson*

Anthony D. Glosson

Kilpatrick Townsend & Stockton LLP  
Washington DC  
Suite 900 | 607 14th Street, NW | Washington, DC 20005-2018  
office 202 508 5842

Enclosure: Sample Notice and Credit Monitoring Details

CONFIDENTIAL

September 3, 2021

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SAMPLE A SAMPLE - L02 NON-MA  
APT 123  
123 ANY ST  
ANYTOWN, US 12345-6789

Re: Notice of Data Breach

Dear Sample A Sample,

The Victory Bank recently suffered and recovered from a malware attack. We took immediate action to prevent misuse of anyone's data, and do not know of or expect misuse of anyone's data as a result of this incident, but out of an abundance of caution and because we care about your privacy and security, we are making two years of credit monitoring available to you. This notice explains the incident, measures we have taken, and steps you can take in response.

**What happened?** In June of this year, our systems became encrypted, blocking access to those systems. We immediately brought in third-party experts on this type of malware, notified law enforcement and engaged directly with the threat actor. We have done everything possible to protect your data, and do not know of or expect any misuse of anyone's data. Most of our sensitive customer information is outsourced to vendors whose systems were not attacked. On August 28<sup>th</sup>, we became aware that some of your information was temporarily exposed to the threat actor, but never published.

**What information was involved?** Again, we do not know of or expect misuse of anyone's data, but it is possible that your Social Security number or driver's license number was temporarily exposed to the threat actor, but never published. If our continuing investigation turns up any evidence that your data was used inappropriately, we will let you know.

**What we are doing and what you can do:** We are committed to safeguarding your personal information and have taken prompt steps to enhance the protections that were already in place before this incident.

In an abundance of caution, to help protect your identity, we are offering a complimentary two-year membership in Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by:** \_\_\_\_\_ (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code:** ABCDEFGHI

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at \_\_\_\_\_ by \_\_\_\_\_. Be prepared to provide engagement number \_\_\_\_\_ as proof of eligibility for the identity restoration services by Experian.

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## ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 1-877-355-3282. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

**For more information**, please see the attached descriptions of other steps you can take.

We sincerely apologize for this incident and regret any inconvenience it may cause you. Should you have questions or concerns regarding this matter, please call \_\_\_\_\_ toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number \_\_\_\_\_. You may also contact us at [incidentquestions@victorybank.com](mailto:incidentquestions@victorybank.com).

Sincerely,

Joe Major  
Chief Executive Officer

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant Company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## **Information about Identity Theft Prevention**

We recommend that, as a consumer, you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8 228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

**Equifax**, P.O. Box 105139, Atlanta, Georgia 30374-0241, 1-800-685-1111, [www.equifax.com](http://www.equifax.com)

**Experian**, P.O. Box 2002, Allen, TX 75013, 1-888-397-374 2, [www.experian.com](http://www.experian.com)

**TransUnion**, P.O. Box 6790, Fullerton, CA 92834-6790, 1-800-916-8800, [www.transunion.com](http://www.transunion.com)

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Consumers should always remain vigilant with respect to reviewing their account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to the proper law enforcement authorities, including local law enforcement, a state's attorney general and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding identity theft.

**Federal Trade Commission**, Consumer Response Center

600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

**For residents of Maryland:** You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General:

**Maryland Office of the Attorney General**, Consumer Protection Division

200 St. Paul Place, Baltimore, MD 21202, 1-888-743-00 23, [www.oag.state.md.us](http://www.oag.state.md.us)

**For residents of Massachusetts:** You also have the right to obtain a police report.

**For residents of North Carolina:** You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

**North Carolina Attorney General's Office**, Consumer Protection Division

9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, [www.ncdoj.gov](http://www.ncdoj.gov)

**For residents of Rhode Island:** You may also obtain information about preventing and avoiding identity theft from the Rhode Island Attorney General's Office:

**Rhode Island Attorney General's Office**, Consumer Protection Division

150 South Main Street, Providence, RI 02903 (401) 274-4400,

<http://www.riag.ri.gov/ConsumerProtection/About.php#>

**Fraud Alerts:** There are also two types of fraud alerts that you can place on your credit report to put your creditors on notice that you may be a victim of fraud: an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by calling the toll-free fraud number of any of the three national credit reporting agencies listed below.

Equifax: 1-800-525-6 285, [www.equifax.com](http://www.equifax.com)

Experian: 1-888-397-374 2, [www.experian.com](http://www.experian.com)

TransUnion: 1-800-680-7 289, [www.transunion.com](http://www.transunion.com)

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**Credit Freezes (for Non-Massachusetts Residents):** You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. *Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.* Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax, P.O. Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

Experian, P.O. Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)

TransUnion, LLC, P.O. Box 2000, Chester, PA, 19022-2000, [www.transunion.com](http://www.transunion.com)

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

**Credit Freezes (for Massachusetts Residents):** Massachusetts law gives you the right to place a security freeze on your consumer reports. A security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. Using a security freeze, however, may delay your ability to obtain credit. You may request that a freeze be placed on your credit report by sending a request to a credit reporting agency by certified mail, overnight mail or regular stamped mail to the address below:

Equifax, P.O. Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

Experian, P.O. Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)

TransUnion, LLC, P.O. Box 2000, Chester, PA, 19022-2000, [www.transunion.com](http://www.transunion.com)

*Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.* The following information should be included when requesting a security freeze (documentation for you and your spouse must be submitted when freezing a spouse's credit report): full name, with middle initial and any suffixes; Social Security number; date of birth (month, day and year); current address and previous addresses for the past five (5) years; and applicable fee (if any) or incident report or complaint with a law enforcement agency or the Department of Motor Vehicles. The request should also include a copy of a government-issued identification card, such as a driver's license, state or military ID card, and a copy of a utility bill, bank or insurance statement. Each copy should be legible, display your name and current mailing address, and the date of issue (statement dates must be recent). The credit reporting company may charge a reasonable fee of up to \$5 to place a freeze or lift or remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and have and have submitted a valid police report relating to the ID theft to the credit reporting company.